

Docket

TENNESSEE VALLEY AUTHORITY
Watts Bar Nuclear Plant
P. O. Box 800
Spring City, Tennessee 37381

October 7, 1987

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Gentlemen:

In the Matter of the Application of) Docket Nos. 50-327, 50-328
Tennessee Valley Authority) 50-390, 50-391
50-259, 50-260
50-296, 50-438
50-439

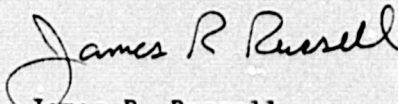
EMPLOYEE CONCERNS TASK GROUP (ECTG)

Enclosure 1 provides a listing of the NSRS and Subcategory Reports and titles addressing the concerns for the Employee Concerns Special Program. Enclosure 2 transmits two final reports addressing Browns Ferry and Bellefonte NSRS concerns. Enclosure 3 transmits two SWEC Subcategory Reports. As indicated by the report cover sheets, these reports have completed final review by the Senior Review Panel and the Employee Concern Task Group management.

Please telephone me at (615) 365-3587 (Watts Bar) if you have any questions.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



James R. Russell
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ECTG Licensing Manager

cc (See page 2.):

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U.S. Nuclear Regulatory Commission

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Spring City, Tennessee 37381

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Bellefonte Nuclear Plant
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Enclosure 1

NSRS REPORT

BFN-NSRS-1

BLN-NSRS-1

TITLE

Review of Nuclear Safety
Review Staff Restart Items
at Browns Ferry

Review of Nuclear Safety
Review Staff Startup Items
at Bellefonte

SUBCATEGORY REPORT

SWEC-BLN-100

SWEC-BFN-100

TITLE

Stone & Webster Engineering
Corporation (SWEC)
Systematic Analysis of
Identified Issues/Concerns
at TVA

Stone & Webster Engineering
Corporation (SWEC)
Systematic Analysis of
Identified Issues/Concerns
at TVA

Enclosure 2

TVA EMPLOYEE CONCERN
SPECIAL PROGRAM

REPORT NUMBER: BFN-NSRS-1

REPORT TYPE: Browns Ferry Nuclear Plant Element

REVISION NUMBER: 3

TITLE : Review of Nuclear Safety Review Staff Restart
Items at Browns Ferry

REASON FOR REVISION: Revised to show current status (June 1987) of the NSRS items
at Browns Ferry.

SUMMARY STATEMENT: The 24 items in this report were identified by the Nuclear
Safety Review Staff (NSRS) and were assigned to the Employee Concerns Task
Group (ECTG) for verification and closure. The verification activities are
described in this report.

PREPARATION

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6/22/87
DATE

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APPROVED BY:

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ECSP MANAGER

8/6/87
DATE

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MANAGER OF NUCLEAR POWER
CONCURRENCE (FINAL REPORT ONLY)

DATE

*SRO Secretary's signature denotes SRP concurrences are in files.

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EXECUTIVE SUMMARY

BFN-NSRS-1

Review of Nuclear Safety Review Staff (NSRS) Open Items Requiring Resolution at Browns Ferry Nuclear Plant (BFN) prior to unit 2 restart.

The NSRS conducted reviews of activities at BFN during its span of overview responsibility from 1979 to 1986. The NSRS items remaining open in 1987 have been examined by the Employee Concerns Task Group (ECTG).

The ECTG examined the status of NSRS issues including those identified specifically for BFN as well as other sites' issues which could have generic applicability BFN. In all, 109 issues were considered applicable to BFN including 24 requiring resolution prior to unit 2 restart. The status of these restart issues is the subject of this BFN-NSRS-1 report. The remaining 85 issues are considered non-restart items and are addressed in report BFN-NSRS-2.

The 24 issues discussed in this report are closed items. Some associated activities or areas related to the items may, in fact, still be incomplete. However, these NSRS items are considered closed because the ECTG, through the evaluation process, determined that sufficient resources have been committed to the issues to ensure their satisfactory completion and closure. This confidence is derived from interviews with cognizant TVA personnel and reviews of applicable documentation.

The status of each of the 24 NSRS restart issues for BFN is as follows:

Closed	R-80-05-SQN-4B	Configuration Control
Closed	R-82-08-NPS-10A	Management Attention Required for Resolution (BFN Regulatory Guide 4.15 Program and Laboratory Quality Program)
Closed	R-82-08-NPS-10B	Management Attention Required (Possible High Radiation Exposure Following Accidental Break of the Main Steam Line)
Closed	R-82-08-NPS-10C	Issuing of Directives Contrary to TVA Commitments (Chemistry Program)
Closed	I-83-28-BFN-02	A Change in Radwaste System Operations is Necessary for Disposal of Spent Radioactive Resins
Closed	I-84-16-BFN-05	Transient Analysis on System Piping for High Pressure Coolant Injection (HPCI)

Open	R-84-17-NPS-5	Cable Assemblies at BFN with Assigned QA Level I Fabricated by TVA from QA Level II Parts and No Mechanism to Upgrade QA Classification
Open	R-84-17-NPS-10	Commercial Grade Items with QA Levels I and II Designations
Open	R-84-17-NPS-11	Quality Verification for Commercial Grade Items
Closed	R-84-17-NPS-12	Receipt Inspection of QA Level I and II Items by Field Quality Engineers
Open	R-84-19-WBN-01	Clear Identification of Purposes and Uses of All Controlled Documents
Closed	R-84-19-WBN-06	Instantaneous Trip Settings of the Breakers for Motor-Operated Valves
Open	R-84-19-WBN-07	Development of Criteria for Cable Tray Fill Level and QC Inspection
Open	I-84-33-BFN-01	Investigation of Piping and Supports
Open	I-84-34-SQN-03	Availability of the Material Certification and Requirements for Heat Numbers
Open	I-85-06-WBN-01	The Adequacy of Dispositions for Identified Cable Bend Radius Problems
Open	I-85-06-WBN-02	The Adequacy of the Program for Cable Pulling Activities
Open	I-85-06-WBN-03	Voltage Drop & Short Circuit Current Determination & Verification
Open	R-85-08-OE/NUC PR-1	Inadequate OE Environmental Qualification Procedure for Equipment Qualification by Similarity
Closed	R-85-08-OE/NUC PR-2	Inadequate OE and NUC PR Procedures for Initiating and Processing NCR-FE/ERS
Closed	R-85-08-OE/NUC PR-3	Lack of Priority on SQN NCR Initiation

Closed R-85-08-OE/NUC PR-4 Lack of Engineer Awareness of NCR-FE/ER
CAQR Procedure

Closed R-85-08-OE/NUC PR-5 Lack of Timeliness in Initiating and
Processing NCR-FE/ERs

Closed R-85-08-OE/NUC PR-6 Failure of Management to Correct Problems
with Timeliness and Responsiveness

Preface

This subcategory report is one of a series of reports prepared for the Employee Concerns Special Program (ECSP) of the Tennessee Valley Authority (TVA). The ECSP and the organization which carried out the program, the Employee Concerns Task Group (ECTG), were established by TVA's Manager of Nuclear Power to evaluate and report on those Office of Nuclear Power (ONP) employee concerns filed before February 1, 1986. Concerns filed after that date are handled by the ongoing ONP Employee Concerns Program (ECP).

The ECSP addressed over 5800 employee concerns. Each of the concerns was a formal, written description of a circumstance or circumstances that an employee thought was unsafe, unjust, inefficient, or inappropriate. The mission of the Employee Concerns Special Program was to thoroughly investigate all issues presented in the concerns and to report the results of those investigations in a form accessible to ONP employees, the NRC, and the general public. The results of these investigations are communicated by four levels of ECSP reports: element, subcategory, category, and final.

Element reports, the lowest reporting level, will be published only for those concerns directly affecting the restart of Sequoyah Nuclear Plant's reactor unit 2. An element consists of one or more closely related issues. An issue is a potential problem identified by ECTG during the evaluation process as having been raised in one or more concerns. For efficient handling, what appeared to be similar concerns were grouped into elements early in the program, but issue definitions emerged from the evaluation process itself. Consequently, some elements did include only one issue, but often the ECTG evaluation found more than one issue per element.

Subcategory reports summarize the evaluation of a number of elements. However, the subcategory report does more than collect element level evaluations. The subcategory level overview of element findings leads to an integration of information that cannot take place at the element level. This integration of information reveals the extent to which problems overlap more than one element and will therefore require corrective action for underlying causes not fully apparent at the element level.

To make the subcategory reports easier to understand, three items have been placed at the front of each report: a preface, a glossary of the terminology unique to ECSP reports, and a list of acronyms.

Additionally, at the end of each subcategory report will be a Subcategory Summary Table that includes the concern numbers; identifies other subcategories that share a concern; designates nuclear safety-related, safety significant, or non-safety related concerns; designates generic applicability; and briefly states each concern.

Either the Subcategory Summary Table or another attachment or a combination of the two will enable the reader to find the report section or sections in which the issue raised by the concern is evaluated.

The subcategories are themselves summarized in a series of eight category reports. Each category report reviews the major findings and collective significance of the subcategory reports in one of the following areas:

- management and personnel relations
- industrial safety
- construction
- material control
- operations
- quality assurance/quality control
- welding
- engineering

A separate report on employee concerns dealing with specific contentions of intimidation, harassment, and wrongdoing will be released by the TVA Office of the Inspector General.

Just as the subcategory reports integrate the information collected at the element level, the category reports integrate the information assembled in all the subcategory reports within the category, addressing particularly the underlying causes of those problems that run across more than one subcategory.

A final report will integrate and assess the information collected by all of the lower level reports prepared for the ECSP, including the Inspector General's report.

For more detail on the methods by which ECTG employee concerns were evaluated and reported, consult the Tennessee Valley Authority Employee Concerns Task Group Program Manual. The Manual spells out the program's objectives, scope, organization, and responsibilities. It also specifies the procedures that were followed in the investigation, reporting, and closeout of the issues raised by employee concerns.

ECSP GLOSSARY OF REPORT TERMS*

classification of evaluated issues the evaluation of an issue leads to one of the following determinations:

Class A: Issue cannot be verified as factual

Class B: Issue is factually accurate, but what is described is not a problem (i.e., not a condition requiring corrective action)

Class C: Issue is factual and identifies a problem, but corrective action for the problem was initiated before the evaluation of the issue was undertaken

Class D: Issue is factual and presents a problem for which corrective action has been, or is being, taken as a result of an evaluation

Class E: A problem, requiring corrective action, which was not identified by an employee concern, but was revealed during the ECTG evaluation of an issue raised by an employee concern.

collective significance an analysis which determines the importance and consequences of the findings in a particular ECSP report by putting those findings in the proper perspective.

concern (see "employee concern")

corrective action steps taken to fix specific deficiencies or discrepancies revealed by a negative finding and, when necessary, to correct causes in order to prevent recurrence.

criterion (plural: criteria) a basis for defining a performance, behavior, or quality which ONP imposes on itself (see also "requirement").

element or element report an optional level of ECSP report, below the subcategory level, that deals with one or more issues.

employee concern a formal, written description of a circumstance or circumstances that an employee thinks unsafe, unjust, inefficient or inappropriate; usually documented on a K-form or a form equivalent to the K-form.

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evaluator(s) the individual(s) assigned the responsibility to assess a specific grouping of employee concerns.

findings includes both statements of fact and the judgments made about those facts during the evaluation process; negative findings require corrective action.

issue a potential problem, as interpreted by the ECTG during the evaluation process, raised in one or more concerns.

K-form (see "employee concern")

requirement a standard of performance, behavior, or quality on which an evaluation judgment or decision may be based.

root cause the underlying reason for a problem.

*Terms essential to the program but which require detailed definition have been defined in the ECTG Procedure Manual (e.g., generic, specific, nuclear safety-related, unreviewed safety-significant question).

Acronyms

AI	Administrative Instruction
AISC	American Institute of Steel Construction
ALARA	As Low As Reasonably Achievable
ANS	American Nuclear Society
ANSI	American National Standards Institute
ASME	American Society of Mechanical Engineers
ASTM	American Society for Testing and Materials
AWS	American Welding Society
BFN	Browns Ferry Nuclear Plant
BLN	Bellefonte Nuclear Plant
CAQ	Condition Adverse to Quality
CAR	Corrective Action Report
CATD	Corrective Action Tracking Document
CCTS	Corporate Commitment Tracking System
CEG-H	Category Evaluation Group Head
CFR	Code of Federal Regulations
CI	Concerned Individual
CMTR	Certified Material Test Report
COC	Certificate of Conformance/Compliance
DCR	Design Change Request
DNC	Division of Nuclear Construction (see also NU COM)

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DNE Division of Nuclear Engineering
DNQA Division of Nuclear Quality Assurance
DNT Division of Nuclear Training
DOE Department of Energy
DPO Division Personnel Officer
DR Discrepancy Report or Deviation Report
ECN Engineering Change Notice
ECP Employee Concerns Program
ECP-SR Employee Concerns Program-Site Representative
ECSP Employee Concerns Special Program
ECTG Employee Concerns Task Group
EEOC Equal Employment Opportunity Commission
EQ Environmental Qualification
EMRT Emergency Medical Response Team
EN DES Engineering Design
ERT Employee Response Team or Emergency Response Team
FCR Field Change Request
FSAR Final Safety Analysis Report
FY Fiscal Year
GET General Employee Training
HCI Hazard Control Instruction
HVAC Heating, Ventilating, Air Conditioning
II Installation Instruction
INPO Institute of Nuclear Power Operations
IRN Inspection Rejection Notice

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L/R	Labor Relations Staff
M&AI	Modifications and Additions Instruction
MI	Maintenance Instruction
MSPB	Merit Systems Protection Board
MT	Magnetic Particle Testing
NCR	Nonconforming Condition Report
NDE	Nondestructive Examination
NPP	Nuclear Performance Plan
NPS	Non-plant Specific or Nuclear Procedures System
NQAM	Nuclear Quality Assurance Manual
NRC	Nuclear Regulatory Commission
NSB	Nuclear Services Branch
NSRS	Nuclear Safety Review Staff
NU CON	Division of Nuclear Construction (obsolete abbreviation, see DNC)
NUMARC	Nuclear Utility Management and Resources Committee
OSHA	Occupational Safety and Health Administration (or Act)
ONP	Office of Nuclear Power
OWCP	Office of Workers Compensation Program
PHR	Personal History Record
PT	Liquid Penetrant Testing
QA	Quality Assurance
QAP	Quality Assurance Procedures
QC	Quality Control
QCI	Quality Control Instruction

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QCP	Quality Control Procedure
QTC	Quality Technology Company
RIF	Reduction in Force
RT	Radiographic Testing
SQN	Sequoyah Nuclear Plant
SI	Surveillance Instruction
SOP	Standard Operating Procedure
SRP	Senior Review Panel
SWEC	Stone and Webster Engineering Corporation
IAS	Technical Assistance Staff
T&L	Trades and Labor
TVA	Tennessee Valley Authority
TVILC	Tennessee Valley Trades and Labor Council
UT	Ultrasonic Testing
VI	Visual Testing
WBECSP	Watts Bar Employee Concern Special Program
WBN	Watts Bar Nuclear Plant
WR	Work Request or Work Rules
WP	Workplans